

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Malcolm Mackey

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7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

11 CONSUMER ADVOCACY GROUP, INC.,
12 in the public interest,

13 Plaintiff,

14 v.

15 GROCERY OUTLET, INC., a California
16 Corporation;
17 GROCERY OUTLET BARGAIN
MARKET, a business entity form unknown;
18 and DOES 1-30;

19 Defendants.

CASE NO.

COMPLAINT FOR PENALTY AND
INJUNCTION

Violation of Proposition 65, the Safe
Drinking Water and Toxic Enforcement
Act of 1986 (*Health & Safety Code*, §
25249.5, *et seq.*)

ACTION IS AN UNLIMITED CIVIL
CASE-(exceeds \$25,000)

21 Plaintiff CONSUMER ADVOCACY GROUP, INC. alleges three causes of action
22 against defendants GROCERY OUTLET, INC., GROCERY OUTLET BARGAIN MARKET,
23 and DOES 1-30 as follows:

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THE PARTIES

1. Plaintiff CONSUMER ADVOCACY GROUP, INC. ("Plaintiff" or "CAG") is an organization qualified to do business in the State of California. CAG is a person within the meaning of Health and Safety Code section 25249.11, subdivision (a). CAG, acting as a private attorney general, brings this action in the public interest as defined under Health and Safety Code section 25249.7, subdivision (d).
2. Defendant GROCERY OUTLET, INC. ("GROCERY OUTLET") is a California Corporation, qualified to do business in California, and doing business in the State of California at all relevant times herein.
3. Defendant GROCERY OUTLET BARGAIN MARKET ("GROCERY BARGAIN") is a business entity form unknown, doing business in the State of California at all relevant times herein.
4. Plaintiff is presently unaware of the true names and capacities of defendants DOES 1-30, and therefore sues these defendants by such fictitious names. Plaintiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed, believes, and thereon alleges that each fictitiously named defendant is responsible in some manner for the occurrences herein alleged and the damages caused thereby.
5. At all times mentioned herein, the term "Defendants" includes GROCERY OUTLET, GROCERY BARGAIN, and DOES 1-30.
6. Plaintiff is informed and believes, and thereon alleges that each of the Defendants at all times mentioned herein have conducted business within the State of California.
7. Upon information and belief, at all times relevant to this action, each of the Defendants, including DOES 1-30, was an agent, servant, or employee of each of the other Defendants. In conducting the activities alleged in this Complaint, each of the Defendants was acting within the course and scope of this agency, service, or employment, and was acting with the consent, permission, and authorization of each of

1 the other Defendants. All actions of each of the Defendants alleged in this Complaint
2 were ratified and approved by every other Defendant or their officers or managing agents.
3 Alternatively, each of the Defendants aided, conspired with and/or facilitated the alleged
4 wrongful conduct of each of the other Defendants.

- 5 8. Plaintiff is informed, believes, and thereon alleges that at all relevant times, each of the
6 Defendants was a person doing business within the meaning of Health and Safety Code
7 section 25249.11, subdivision (b), and that each of the Defendants had ten (10) or more
8 employees at all relevant times.

9 **JURISDICTION**

- 10 9. The Court has jurisdiction over this lawsuit pursuant to California Constitution Article
11 VI, Section 10, which grants the Superior Court original jurisdiction in all causes except
12 those given by statute to other trial courts. This Court has jurisdiction over this action
13 pursuant to Health and Safety Code section 25249.7, which allows enforcement of
14 violations of Proposition 65 in any Court of competent jurisdiction.
- 15 10. This Court has jurisdiction over Defendants named herein because Defendants either
16 reside or are located in this State or are foreign corporations authorized to do business in
17 California, are registered with the California Secretary of State, or who do sufficient
18 business in California, have sufficient minimum contacts with California, or otherwise
19 intentionally avail themselves of the markets within California through their manufacture,
20 distribution, promotion, marketing, or sale of their products within California to render
21 the exercise of jurisdiction by the California courts permissible under traditional notions
22 of fair play and substantial justice.
- 23 11. Venue is proper in the County of Los Angeles because one or more of the instances of
24 wrongful conduct occurred, and continues to occur, in the County of Los Angeles and/or
25 because Defendants conducted, and continue to conduct, business in the County of Los
26 Angeles with respect to the consumer product that is the subject of this action.

1 BACKGROUND AND PRELIMINARY FACTS

2 12. In 1986, California voters approved an initiative to address growing concerns about
3 exposure to toxic chemicals and declared their right "[t]o be informed about exposures to
4 chemicals that cause cancer, birth defects, or other reproductive harm." Ballot Pamp.,
5 Proposed Law, Gen. Elec. (Nov. 4, 1986) at p. 3. The initiative, The Safe Drinking
6 Water and Toxic Enforcement Act of 1986, codified at Health and Safety Code sections
7 25249.5, *et seq.* ("Proposition 65"), helps to protect California's drinking water sources
8 from contamination, to allow consumers to make informed choices about the products
9 they buy, and to enable persons to protect themselves from toxic chemicals as they see
10 fit.

11 13. Proposition 65 requires the Governor of California to publish a list of chemicals known to
12 the state to cause cancer, birth defects, or other reproductive harm. *Health & Safety Code*
13 § 25249.8. The list, which the Governor updates at least once a year, contains over 700
14 chemicals and chemical families. Proposition 65 imposes warning requirements and
15 other controls that apply to Proposition 65-listed chemicals.

16 14. All businesses with ten (10) or more employees that operate or sell products in California
17 must comply with Proposition 65. Under Proposition 65, businesses are: (1) prohibited
18 from knowingly discharging Proposition 65-listed chemicals into sources of drinking
19 water (*Health & Safety Code* § 25249.5), and (2) required to provide "clear and
20 reasonable" warnings before exposing a person, knowingly and intentionally, to a
21 Proposition 65-listed chemical (*Health & Safety Code* § 25249.6).

22 15. Proposition 65 provides that any person "violating or threatening to violate" the statute
23 may be enjoined in any court of competent jurisdiction. *Health & Safety Code* § 25249.7.
24 "Threaten to violate" means "to create a condition in which there is a substantial
25 probability that a violation will occur." *Health & Safety Code* § 25249.11(e).
26 Defendants are also liable for civil penalties of up to \$2,500.00 per day per violation,
27 recoverable in a civil action. *Health & Safety Code* § 25249.7(b).

- 1 16. Plaintiff identified certain practices of product manufacturers and distributors of
2 exposing, knowingly and intentionally, persons in California to Bis (2-ethylhexyl)
3 phthalate ("DEHP") and Lead and Lead Compounds ("Lead"), chemicals listed under
4 Proposition 65, without first providing clear and reasonable warnings of such to the
5 exposed persons prior to the time of exposure. Plaintiff later discerned that Defendants
6 engaged in such practice.
- 7 17. On February 27, 1987, the Governor of California added Lead to the list of chemicals
8 known to the State to cause reproductive and developmental toxicity (*Cal. Code Regs. tit.*
9 *27, § 27001(b)*). Pursuant to Health and Safety Code sections 25249.9 and 25249.10,
10 twenty (20) months after addition of Lead to the list of chemicals known to the State to
11 cause reproductive and developmental toxicity, Lead became fully subject to Proposition
12 65 warning requirements and discharge prohibitions.
- 13 18. On January 1, 1988, the Governor of California added DEHP to the list of chemicals
14 known to the State to cause cancer (*Cal. Code Regs. tit. 27, § 27001(b)*). Pursuant to
15 Health and Safety Code sections 25249.9 and 25249.10, twenty (20) months after
16 addition of DEHP to the list of chemicals known to the State to cause cancer, DEHP
17 became fully subject to Proposition 65 warning requirements and discharge prohibitions.
- 18 19. On October 1, 1992, the Governor of California added Lead to the list of chemicals
19 known to the State to cause cancer (*Cal. Code Regs. tit. 27, § 27001(b)*). Pursuant to
20 Health and Safety Code sections 25249.9 and 25249.10, twenty (20) months after
21 addition of Lead to the list of chemicals known to the State to cause cancer, Lead became
22 fully subject to Proposition 65 warning requirements and discharge prohibitions.
- 23 20. On October 24, 2003, the Governor of California added DEHP to the list of chemicals
24 known to the State to cause reproductive and developmental toxicity (*Cal. Code Regs. tit.*
25 *27, § 27001(c)*). Pursuant to Health and Safety Code sections 25249.9 and 25249.10,
26 twenty (20) months after addition of DEHP to the list of chemicals known to the State to
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1 cause reproductive and developmental toxicity, DEHP became fully subject to
2 Proposition 65 warning requirements and discharge prohibitions.

3 **SATISFACTION OF PRIOR NOTICE**

- 4 21. On or about October 15, 2018, Plaintiff gave notice of alleged violations of Health and
5 Safety Code section 25249.6, concerning consumer products exposures, subject to a
6 private action to GROCERY OUTLET and to the California Attorney General, County
7 District Attorneys, and City Attorneys for each city containing a population of at least
8 750,000 people in whose jurisdictions the violations allegedly occurred, concerning the
9 product Ground Cinnamon.
- 10 22. On or about November 30, 2018, Plaintiff gave notice of alleged violations of Health and
11 Safety Code section 25249.6, concerning consumer products exposures, subject to a
12 private action to GROCERY OUTLET, GROCERY BARGAIN, and to the California
13 Attorney General, County District Attorneys, and City Attorneys for each city containing
14 a population of at least 750,000 people in whose jurisdictions the violations allegedly
15 occurred, concerning the product Umbrellas.
- 16 23. On or about December 21, 2018, Plaintiff gave notice of alleged violations of Health and
17 Safety Code section 25249.6, concerning consumer products exposures, subject to a
18 private action to GROCERY OUTLET, GROCERY BARGAIN, and to the California
19 Attorney General, County District Attorneys, and City Attorneys for each city containing
20 a population of at least 750,000 people in whose jurisdictions the violations allegedly
21 occurred, concerning the product Car Mount.
- 22 24. Before sending the notices of alleged violation, Plaintiff investigated the consumer
23 products involved, the likelihood that such products would cause users to suffer
24 significant exposures to DEHP and Lead, and the corporate structure of each of the
25 Defendants.
- 26 25. Plaintiff's notice of alleged violation included a Certificate of Merit executed by the
27 attorney for the noticing party, CAG. The Certificate of Merit stated that the attorney for
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1 Plaintiff who executed the certificate had consulted with at least one person with relevant
2 and appropriate expertise who reviewed data regarding the exposures to DEHP and Lead,
3 the subject Proposition 65-listed chemicals of this action. Based on that information, the
4 attorney for Plaintiff who executed the Certificate of Merit believed there was a
5 reasonable and meritorious case for this private action. The attorney for Plaintiff attached
6 to the Certificate of Merit served on the Attorney General the confidential factual
7 information sufficient to establish the basis of the Certificate of Merit.

8 26. Plaintiff's notices of alleged violations also included a Certificate of Service and a
9 document entitled "The Safe Drinking Water & Toxic Enforcement Act of 1986
10 (Proposition 65) A Summary." *Health & Safety Code § 25249.7(d)*.

11 27. Plaintiff is commencing this action more than sixty (60) days from the dates that Plaintiff
12 gave notices of the alleged violations to GROCERY OUTLET, GROCERY BARGAIN,
13 and the public prosecutors referenced in Paragraphs 21-23.

14 28. Plaintiff is informed, believes, and thereon alleges that neither the Attorney General, nor
15 any applicable district attorney or city attorney has commenced and is diligently
16 prosecuting an action against the Defendants.

17 **FIRST CAUSE OF ACTION**

18 **(By CONSUMER ADVOCACY GROUP, INC. and against GROCERY OUTLET**
19 **and DOES 1-10 for Violations of Proposition 65, The Safe Drinking Water and**
20 **Toxic Enforcement Act of 1986 (*Health & Safety Code, §§ 25249.5, et seq.*))**

21 **Ground Spices**

22 29. Plaintiff CONSUMER ADVOCACY GROUP, INC. repeats and incorporates by
23 reference paragraphs 1 through 28 of this complaint as though fully set forth herein.

24 30. Each of the Defendants is, and at all times mentioned herein was, a manufacturer,
25 distributor, promoter, or retailer of Ground Cinnamon, identified as "EL MONTE
26 SPICES;" "CANELA MOLIDA (GROUND CINNAMON);" "NET WT. 1 OZ.-(28G);"

1 "PACKED AND DISTRIBUTED BY: EL MONTE SPICES, EL MONTE, CA 91731;"
2 "PRODUCTION DE SRI LANKA;" "6 37298 00029 2" ("Ground Cinnamon").

3 31. Ground Cinnamon contains Lead.

4 32. Defendants knew or should have known that Lead has been identified by the State of
5 California as a chemical known to cause cancer and reproductive and developmental
6 toxicity and therefore was subject to Proposition 65 warning requirements. Defendants
7 were also informed of the presence of Lead in Ground Cinnamon within Plaintiff's notice
8 of alleged violations further discussed above at Paragraph 21.

9 33. Plaintiff's allegations regarding Ground Cinnamon concerns "[c]onsumer products
10 exposure[s]," which "is an exposure that results from a person's acquisition, purchase,
11 storage, consumption, or other reasonably foreseeable use of a consumer good, or any
12 exposure that results from receiving a consumer service." *Cal. Code Regs. tit. 27, §*
13 *25602(b)*. Ground Cinnamon is a consumer product, and, as mentioned herein, exposures
14 to Lead took place as a result of such normal and foreseeable consumption and use.

15 34. Plaintiff is informed, believes, and thereon alleges that between October 15, 2015 and the
16 present, each of the Defendants knowingly and intentionally exposed California
17 consumers and users of Ground Cinnamon, which Defendants manufactured, distributed,
18 or sold as mentioned above, to Lead, without first providing any type of clear and
19 reasonable warning of such to the exposed persons before the time of exposure.
20 Defendants have distributed and sold Ground Cinnamon in California. Defendants know
21 and intend that California consumers will use and consume Ground Cinnamon, thereby
22 exposing them to Lead. Defendants thereby violated Proposition 65.

23 35. The principal routes of exposure with regard to Ground Cinnamon are and were through
24 ingestion, including hand to mouth pathways, inhalation, and trans-dermal absorption.
25 Persons sustain exposures primarily by eating and consuming Ground Cinnamon, and
26 additionally handling Ground Cinnamon without wearing gloves or any other personal
27 protective equipment, or by touching bare skin or mucous membranes with gloves after
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1 handling Ground Cinnamon, as well as through direct and indirect hand to mouth contact,
2 hand to mucous membrane, or even breathing in particulate matter dispersed from
3 Ground Cinnamon.

4 36. Plaintiff is informed, believes, and thereon alleges that each of Defendants' violations of
5 Proposition 65 as to Ground Cinnamon have been ongoing and continuous, as Defendants
6 engaged and continue to engage in conduct which violates Health and Safety Code
7 section 25249.6, including the manufacture, distribution, promotion, and sale of Ground
8 Cinnamon, so that a separate and distinct violation of Proposition 65 occurred each and
9 every time a person was exposed to Lead by Ground Cinnamon as mentioned herein.

10 37. Plaintiff is informed, believes, and thereon alleges that each violation of Proposition 65
11 mentioned herein is ever continuing. Plaintiff further alleges and believes that the
12 violations alleged herein will continue to occur into the future.

13 38. Based on the allegations herein, Defendants are liable for civil penalties of up to
14 \$2,500.00 per day per individual exposure to Lead from Ground Cinnamon, pursuant to
15 Health and Safety Code section 25249.7(b).

16 39. Plaintiff has engaged in good faith efforts to resolve the claims alleged herein prior to
17 filing this Complaint.

18 **SECOND CAUSE OF ACTION**

19 **(By CONSUMER ADVOCACY GROUP, INC. and against GROCERY OUTLET,
20 GROCERY BARGAIN, and DOES 11-20 for Violations of Proposition 65, The Safe
21 Drinking Water and Toxic Enforcement Act of 1986 (Health & Safety Code, §§
25249.5, et seq.))**

22 **Accessories**

23 40. Plaintiff CONSUMER ADVOCACY GROUP, INC. repeats and incorporates by
24 reference paragraphs 1 through 39 of this complaint as though fully set forth herein.

25 41. Each of the Defendants is, and at all times mentioned herein was, a manufacturer,
26 distributor, promoter, or retailer of Umbrellas, including but not limited to "Multicolor
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1 Umbrella;" "Ultra Violet Protection;" "\$3.99" "Elsewhere \$7.99;" "Grocery Outlet
2 bargain market;" "Distributed by: Grocery Outlet Inc. Emeryville, CA 94608;" "Made in
3 China;" "#7664716;" "317XVIIIP021;" "7 63562 03942 9" ("Umbrellas").

4 42. Umbrellas contain DEHP.

5 43. Defendants knew or should have known that DEHP has been identified by the State of
6 California as a chemical known to cause cancer and reproductive and developmental
7 toxicity and therefore was subject to Proposition 65 warning requirements. Defendants
8 were also informed of the presence of DEHP in Umbrellas within Plaintiff's notice of
9 alleged violations further discussed above at Paragraph 22.

10 44. Plaintiff's allegations regarding Umbrellas concerns "[c]onsumer products exposure[s],"
11 which "is an exposure that results from a person's acquisition, purchase, storage,
12 consumption, or other reasonably foreseeable use of a consumer good, or any exposure
13 that results from receiving a consumer service." *Cal. Code Regs. tit. 27, § 25602(b)*.
14 Umbrellas are consumer products, and, as mentioned herein, exposures to DEHP took
15 place as a result of such normal and foreseeable use.

16 45. Plaintiff is informed, believes, and thereon alleges that between November 30, 2015 and
17 the present, each of the Defendants knowingly and intentionally exposed California users
18 of Umbrellas, which Defendants manufactured, distributed, or sold as mentioned above,
19 to DEHP, without first providing any type of clear and reasonable warning of such to the
20 exposed persons before the time of exposure. Defendants have distributed and sold
21 Umbrellas in California. Defendants know and intend that California customers will use
22 Umbrellas, thereby exposing them to DEHP. Defendants thereby violated Proposition
23 65.

24 46. The principal routes of exposure are through dermal contact, and ingestion. Persons
25 sustain exposures by using, handling, or carrying Umbrellas without wearing gloves or by
26 touching bare skin or mucous membranes with or without gloves after handling
27 Umbrellas, as well as through direct and indirect hand to mouth contact, hand to mucous

1 membrane, or breathing in particulate matter emanating from Umbrellas during use, as
2 well as through environmental mediums that carry the DEHP once contained within the
3 Umbrellas.

4 47. Plaintiff is informed, believes, and thereon alleges that each of Defendants' violations of
5 Proposition 65 as to Umbrellas have been ongoing and continuous, as Defendants
6 engaged and continue to engage in conduct which violates Health and Safety Code
7 section 25249.6, including the manufacture, distribution, promotion, and sale of
8 Umbrellas, so that a separate and distinct violation of Proposition 65 occurred each and
9 every time a person was exposed to DEHP by Umbrellas as mentioned herein.

10 48. Plaintiff is informed, believes, and thereon alleges that each violation of Proposition 65
11 mentioned herein is ever continuing. Plaintiff further alleges and believes that the
12 violations alleged herein will continue to occur into the future.

13 49. Based on the allegations herein, Defendants are liable for civil penalties of up to
14 \$2,500.00 per day per individual exposure to DEHP from Umbrellas, pursuant to Health
15 and Safety Code section 25249.7(b).

16 50. Plaintiff has engaged in good faith efforts to resolve the claims alleged herein prior to
17 filing this Complaint.

18 **THIRD CAUSE OF ACTION**

19 **(By CONSUMER ADVOCACY GROUP, INC. and against GROCERY OUTLET,
20 GROCERY BARGAIN, and DOES 21-30 for Violations of Proposition 65, The Safe
21 Drinking Water and Toxic Enforcement Act of 1986 (Health & Safety Code, §§
22 25249.5, et seq.))**

23 **Auto Accessories**

24 51. Plaintiff CONSUMER ADVOCACY GROUP, INC. repeats and incorporates by
25 reference paragraphs 1 through 50 of this complaint as though fully set forth herein.

26 52. Each of the Defendants is, and at all times mentioned herein was, a manufacturer,
27 distributor, promoter, or retailer of Windshield Car Mount with Plastic Suction Cup,
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1 including but not limited to “EdgeHome ® Universal Windshield Car Mount”; “360
2 Rotation, 3.3 Inch Expansion, Universal”; “Lot No. 026-00644”; “Item # E-407”;
3 “UPC 8 188801 01407 8”; “Made in China” (“Car Mount”).

4 53. Car Mount contains DEHP.

5 54. Defendants knew or should have known that DEHP has been identified by the State of
6 California as a chemical known to cause cancer and reproductive and developmental
7 toxicity and therefore was subject to Proposition 65 warning requirements. Defendants
8 were also informed of the presence of DEHP in Car Mount within Plaintiff's notice of
9 alleged violations further discussed above at Paragraph 23.

10 55. Plaintiff's allegations regarding Car Mount concerns “[c]onsumer products exposure[s],”
11 which “is an exposure that results from a person's acquisition, purchase, storage,
12 consumption, or other reasonably foreseeable use of a consumer good, or any exposure
13 that results from receiving a consumer service.” *Cal. Code Regs. tit. 27, § 25602(b)*. Car
14 Mount is a consumer product, and, as mentioned herein, exposures to DEHP took place
15 as a result of such normal and foreseeable use.

16 56. Plaintiff is informed, believes, and thereon alleges that between December 21, 2015 and
17 the present, each of the Defendants knowingly and intentionally exposed California users
18 of Car Mount, which Defendants manufactured, distributed, or sold as mentioned above,
19 to DEHP, without first providing any type of clear and reasonable warning of such to the
20 exposed persons before the time of exposure. Defendants have distributed and sold Car
21 Mount in California. Defendants know and intend that California customers will use Car
22 Mount, thereby exposing them to DEHP. Defendants thereby violated Proposition 65.

23 57. The principal routes of exposure are through dermal contact, and ingestion. Persons
24 sustain exposures by using, handling, or carrying Car Mount without wearing gloves or
25 by touching bare skin or mucous membranes with or without gloves after handling Car
26 Mount, as well as through direct and indirect hand to mouth contact, hand to mucous
27 membrane, trans-dermal absorption, or breathing in particulate matter emanating from
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1 Car Mount during use, as well as through environmental mediums that carry the DEHP
2 once contained within the Car Mount.

3 58. Plaintiff is informed, believes, and thereon alleges that each of Defendants' violations of
4 Proposition 65 as to Car Mount have been ongoing and continuous, as Defendants
5 engaged and continue to engage in conduct which violates Health and Safety Code
6 section 25249.6, including the manufacture, distribution, promotion, and sale of Car
7 Mount, so that a separate and distinct violation of Proposition 65 occurred each and every
8 time a person was exposed to DEHP by Car Mount as mentioned herein.

9 59. Plaintiff is informed, believes, and thereon alleges that each violation of Proposition 65
10 mentioned herein is ever continuing. Plaintiff further alleges and believes that the
11 violations alleged herein will continue to occur into the future.

12 60. Based on the allegations herein, Defendants are liable for civil penalties of up to
13 \$2,500.00 per day per individual exposure to DEHP from Car Mount, pursuant to Health
14 and Safety Code section 25249.7(b).

15 61. Plaintiff has engaged in good faith efforts to resolve the claims alleged herein prior to
16 filing this Complaint.

17 **PRAYER FOR RELIEF**

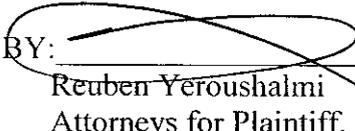
18 Plaintiff demands against each of the Defendants as follows:

- 19 1. A permanent injunction mandating Proposition 65-compliant warnings;
20 2. Penalties pursuant to Health and Safety Code section 25249.7, subdivision (b);
21 3. Costs of suit;
22 4. Reasonable attorney fees and costs; and
23 5. Any further relief that the court may deem just and equitable.

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26 Dated: May 29, 2019

YEROUSHALMI & YEROUSHALMI

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BY: 
Reuben Yeroushalmi
Attorneys for Plaintiff,
Consumer Advocacy Group, Inc.